

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**TRON MADISE,  
*Plaintiff,***

V.

**HARRIS COUNTY, SHERIFF ED  
GONZALEZ, CHARLES BALLARD,  
BRYAN BUCCINI, PAUL CROAS,  
EDMON BENAVIDES AND DEPUTY A.  
DAVIS,**

## JURY DEMAND

## **DEFENDANTS' NOTICE OF REMOVAL**

All Defendants file this Notice of Removal pursuant to 28 U.S.C. § 1441, and would respectfully show as follows:

1. Plaintiff Tron Madise (“Plaintiff”) filed his Original Petition (“the Petition”) on Sept. 9, 2023 under Cause No. 2023-61126, in the 333rd Judicial District Court of Harris County, Texas. Defendants were served by mail, and Harris County accepted service through the undersigned. Ms. Alquitta Davis was served but is not the correct Davis. The party is identified by “A. Davis” in the petition. She has consented to representation and removal to federal court.
2. All the other defendants have consented to representation by Ms. Suzanne Bradley and have consented for removal to federal court.
3. As of this date there are no other named defendants.
4. Defendants’ original notice of removal is being filed within thirty (30) days after service of the Plaintiff’s Original Petition on Defendant which alleges a federal cause of action pursuant to 42 U.S.C. § 1983. In her Original Petition, Plaintiff alleges Defendants, Harris County; Sheriff Ed Gonzalez, individually and officially; officers Charles Ballard; Bryan Buccini; Paul Croas,

Edmon Benavides and A. Davis violated his civil rights on Sept. 10, 2021. He alleges the defendants failed to intervene when Mr. Madise was assaulted by inmate Alexis Limon and others.

5. He alleges violations of this First, Fourth and Fourteenth amendment constitutional rights.

Plaintiff seeks compensatory damages, attorney's fees and costs and has demanded a jury trial.

6. Original jurisdiction of this Court is proper pursuant to 28 U.S.C. §§ 1441(a) and 28 U.S.C. § 1331. Venue in this Court is proper because Harris County, Texas is located within the Southern District of Texas and the Houston Division thereof. Removal to this Court is, therefore, proper under 28 U.S.C. §§ 1441(a) and 1331. All Defendants consent to this removal. There are no additional defendants.

7. Copies of all process and pleadings filed in Cause No. 2023-61126 have been provided to this Court.

8. Written notice of the filing of this Notice is being served on all adverse parties as required by 28 U.S.C. § 1446(d). A true and correct copy of this Notice will be filed with the District Clerk of Harris County, Texas, as required by 28 U.S.C. § 1446(d).

WHEREFORE, Defendants respectfully request that this action be removed to the United States District Court.

Respectfully submitted,

OF COUNSEL:

CHRISTIAN D. MENEFEE  
HARRIS COUNTY ATTORNEY

By: /S/ Suzanne Bradley  
SUZANNE BRADLEY  
Senior Assistant County Attorney  
ATTORNEY-IN-CHARGE  
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VERONICA L. JONES  
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Harris County Attorney's Office  
1019 Congress  
Houston, Texas 77002  
**Attorneys for Defendants**

**CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2023, a true and correct copy of the foregoing was served pursuant to the Federal Rules of Civil Procedure to:

U.A. Lewis  
P.O. Box 27353  
Houston, TX 77227  
Phone: (713) 570-6555  
MyAttorneyAtLaw@gmail.com

*/S/ Suzanne Bradley* \_\_\_\_\_  
SUZANNE BRADLEY